

1 Stephen M. Snyder (Bar No. 54598)
James L. Miller (Bar No. 71958)
2 Peter P. Meringolo (Bar No. 197136)
SNYDER MILLER & ORTON LLP
3 180 Montgomery Street, Suite 700
San Francisco, CA 94104
4 Telephone: (415) 962-4400
Facsimile: (415) 962-4401
5 Email: ssnyder@smollp.com
jmliller@smollp.com
6 pmeringolo@smollp.com

7 Special Insurance Counsel for Debtor and
8 Debtor in Possession
PLANT INSULATION COMPANY
9

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 In re
13 PLANT INSULATION COMPANY, a
California corporation,
14
15 Debtor.

Case No. 09-31347-TC

Chapter 11

**SNYDER MILLER & ORTON LLP'S
THIRD COVER SHEET APPLICATION
FOR REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM OCTOBER 1,
2009 THROUGH OCTOBER 31, 2009**

[No Hearing Required]

Judge: Hon. Thomas E. Carlson

20
21 Snyder Miller & Orton LLP ("SMO") submits its Third Cover Sheet Application (the
22 "Application") for Reimbursement of Expenses for the Period from October 1, 2009 through October
23 31, 2009 (the "Application Period"). In support of the Application, SMO respectfully represents as
24 follows:

25 1. SMO is Special Insurance Counsel for debtor and debtor in possession Plant Insulation
26 Company (the "Debtor") in the above-referenced Chapter 11 case. SMO hereby applies to the Court
27 for reimbursement of expenses incurred during the Application Period.
28

2. SMO billed a total of \$9,183.62 in expenses during the Application Period.

3. SMO seeks reimbursement of 100% of these expenses. Because these costs are below the Contingency Professional Expense Cap, as defined by this Court's *Order Establishing Interim Fee Application and Expense Reimbursement Procedures* entered on September 24, 2009 (the "Interim Fee Procedures Order"), the Debtor is authorized to reimburse SMO for these expenses without prior Court approval.

4. The following chart reflects (1) the post-petition compensation and expense reimbursement amounts SMO has obtained authority to receive from the Debtor's estate pursuant to Interim Fee Procedures Order, and (2) excluding the amounts sought by this Application, the post-petition compensation and expense reimbursement amounts that are currently due and owing to SMO from the Debtor's estate:

Fee Statement Period	Fees Sought (100%)	Expenses Sought (100%)	Fees Authorized (80%)	Expenses Authorized (100%)	Unpaid Fees	Unpaid Expenses
5/20/09 – 8/31/09	NONE	26,288.33	NONE	\$26,288.38	NONE	NONE
9/1/09 – 9/30/09	NONE	\$1,680.79	NONE	\$1,680.79	NONE	\$1,680.79

5. Attached hereto as **Exhibit A** is the detailed billing statement for the Application Period, which includes a breakdown of the expenses incurred during the Application Period. Although the date of some of the advances listed on the detailed billing statement are prior to the Application Period, SMO paid and billed those advances during the Application Period.

6. SMO has served a copy of this Application on the Office of the United States Trustee, the Debtor, counsel for the Official Committee of Unsecured Creditors (the "Committee"), and counsel for the Futures Representative appointed by the Court in this case.

7. Notice of the filing of this Application has been served on the Office of the United States Trustee, the Debtor, counsel to the Committee, counsel to Futures Representative and any party who has requested special notice as of the date of the Notice.

1
2 8. Pursuant to the Interim Fee Procedures Order, the Debtor is authorized to make the
3 payment requested herein without a further hearing or order of this Court unless an objection to this
4 Application is filed with the Court and served within ten (10) calendar days after the date of mailing
5 of the Notice of this Application. If such an objection is filed, the Debtor is authorized to pay the
6 100% of the uncontested expenses.

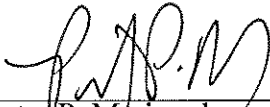
7 9. The reimbursement of expenses sought in this Application is not final. Upon the
8 conclusion of this case, SMO will seek fees and reimbursement of the expenses incurred for the
9 totality of the services rendered in the case. Any interim fees or reimbursement of expenses approved
10 by this Court and received by SMO will be credited against such final fees and expenses as may be
11 allowed by this Court.

12 10. Based upon the foregoing, SMO respectfully requests that the Debtor pay
13 compensation to SMO as requested herein pursuant to and in accordance with the terms of the
14 Interim Fee Procedures Order.

15 DATED: November 27, 2009

SNYDER MILLER & ORTON LLP

16
17
18 By:


Peter P. Meringolo
Special Insurance Counsel for Debtor and
Debtor in Possession, Plant Insulation Company

CERTIFICATE OF SERVICE

I, Michelle Traina, declare that I am over the age of eighteen years and am not a party to this action. My business address is 180 Montgomery Street, Suite 700, San Francisco, California 94104.

On November 24, 2009, I served the following:

SNYDER MILLER & ORTON LLP'S THIRD COVER SHEET APPLICATION FOR REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM OCTOBER 1, 2009 THROUGH OCTOBER 31, 2009

on the interested parties in this action as follows:

[X] BY U.S. MAIL: I caused the above-referenced documents to be served on the parties below which are designated with an asterisk (*) by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid.

[X] BY EMAIL: I caused the above-mentioned documents to be served by email on the parties listed on the enclosed service list on the date specified above, except those designated with an asterisk.

*Debtor Plant Insulation Company c/o TRAVIS & PON 2271 California Street San Francisco, CA 94115 Email: david.j.gordon@verizon.net	*United States Trustee c/o Office of the United States Trustee Donna S. Tamanaha Minnie Loo 235 Pine St., Suite 700 San Francisco, CA 94104-3401 Email: Minnie.Loo@usdoj.gov , Donna.S.Tamanaha@usdoj.gov	*Counsel for Debtor c/o JONES DAY Peter J. Benvenuti, Esq. Tobias S. Keller, Esq. Michaeline H. Correa, Esq. 555 California Street, 26th Floor San Francisco, CA 94104 Email: tkeller@jonesday.com , pjbenvenuti@jonesday.com , mcorrea@jonesday.com
Peter J. Benvenuti Tobias S. Keller Michaeline H. Correa JONES DAY 555 California Street, 26th Floor San Francisco, CA 94104 Telephone: (415) 626-3939 Facsimile: (415) 875-5700 Email: jbenvenuti@jonesday.com tkeller@jonesday.com mcorrea@jonesday.com	Debtor's Special Insurance Counsel c/o MORGAN LEWIS & BOCKIUS Jeffery S. Raskin, Esq. One Market, Spear Street Tower San Francisco, CA 94105-1596 Email: jraskin@morganlewis.com	*Counsel to the Hon. Judge Charles B. Renfrew (Ret.), Futures Representative c/o FERGUS, A LAW OFFICE Gary Fergus, Esq. 595 Market St., Suite 2430 San Francisco, CA 94105 Email: gfergus@ferguslegal.com

{00028580.DOC; 1}

CERTIFICATE OF SERVICE

<p>Responsible Individual Mr. David J. Gordon c/o THE FLINTKOTE COMPANY Two Embarcadero Center, Ste. 410 San Francisco, CA 94111 Email: david.j.gordon@verizon.net</p>	<p>Accountants for Debtor Mr. Jay D. Crom c/o BACHECKI, CROM & CO. LLP 180 Montgomery St., Suite 2340 San Francisco, CA 94104 Email: jcrom@bachcrom.com</p>	<p>Proposed Counsel for Creditors' Committee Peter Van N. Lockwood, Esq. c/o CAPLAN & DRYSDALE CHARTERED One Thomas Circle, N.W. Washington, DC 20005 Email: pvn1@capdale.com</p>
<p>ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o O'MELVENY & MYERS LLP Aaron M. Johnson, Esq. Spencer K. Jones, Esq. Christina Brown, Esq. Patrick T. Hein, Esq. 2 Embarcadero Center, 28th Floor San Francisco, CA 94111 Email: aaronjohnson@omm.com spencerjones@omm.com cjbrown@omm.com phein@omm.com</p>	<p>ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o O'MELVENY & MYERS LLP Richard Goetz, Esq. Steven H. Bergman, Esq. 400 South Hope Street Los Angeles, CA 90071-7899 Email: rgoetz@omm.com sbergman@omm.com</p>	<p>ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o O'MELVENY & MYERS LLP Tancred V. Schiavoni, Esq. Seven Times Square New York, New York 10036 Email: tschiavoni@omm.com</p>
<p>American Automobile Insurance Company and Fireman's Fund Insurance Company c/o CROWELL & MORING LLP Steven P. Rice, Esq. Thy B. Bui, Esq. Queena Mewers, Esq. 3 Park Plaza, 20th Floor Irvine, CA 92614 Email: srice@crowell.com tbui@crowell.com qmewers@crowell.com</p>	<p>American Automobile Insurance Company and Fireman's Fund Insurance Company c/o GRIPPO & ELDEN LLC Donald A. Vogelsang, Esq. Paul A. Sheldon, Esq. Matthew O. Sitzler, Esq. Lynn H. Murray, Esq. Michael S. Gulland, Esq. 111 South Wacker Chicago, IL 60606 Email: dvogelsang@gripoelden.com psheldon@gripoelden.com msitzler@gripoelden.com lmurray@gripoelden.com mgulland@gripoelden.com</p>	<p>*American Automobile Insurance Company and Fireman's Fund Insurance Company c/o BRYDON HUGO & PARKER Jeffrey Kaufman, Esq. 135 Main Street, 20th Floor San Francisco, CA 94105 Email: jkaufman@bhplaw.com</p>

{00028580.DOC; 1}

CERTIFICATE OF SERVICE

<p>Arrowood Indemnity Company fna Royal Indemnity Company c/o SKADDEN ARPS SLATE MEAGHER & FLOM LLP Raoul D. Kennedy, Esq. James P. Schaefer, Esq. Jeffrey W. McKenna, Esq. Four Embarcadero Center San Francisco, CA 94111-4144 Email: raoul.kennedy@skadden.com james.schaefer@skadden.com jeffrey.mckenna@skadden.com</p>	<p>American Automobile Insurance Company and Fireman's Fund Insurance Company c/o CROWELL & MORING LLC Mark D. Plevin, Esq. Cynthia L. Kendrick, Esq. Leslie A. Davis, Esq. Tacie H. Yoon, Esq. Kelly R. Cusick, Esq. Noah S. Bloomberg, Esq. 1001 Pennsylvania Avenue, N.W. Washington, DC 20004 Email: mplevin@crowell.com ckendrick@crowell.com ldavis@crowell.com tyoon@crowell.com kcusick@crowell.com nbloomberg@crowell.com</p>	<p>*American Home Assurance Company Insurance Company of the State of Pennsylvania Granite State Insurance Company c/o LYNBERG & WATKINS P.C. Randall J. Peters, Esq. R. Jeff Carlisle, Esq. Benjamin Phelps, Esq. International Tower Plaza 888 S. Figueroa Street, 16th Floor Los Angeles, CA 90017-5465 Email: rpeters@lynberg.com jcarlisle@lynberg.com bphelps@lynberg.com</p>
<p>*Counsel for Official Committee of Unsecured Creditors Michael Ahrens, Esq. c/o SHEPPARD MULLIN RICHTER & HAMPTON 4 Embarcadero Center, 17th Floor San Francisco, CA 94111-4106 Email: mahrens@sheppardmullin.com</p>	<p>Arrowpoint Capital c/o SKADDEN ARPS SLATE MEAGHER & FLOM LLP Van C. Durrer II, Esq. Bertrand Pan, Esq. 300 South Grand Avenue Los Angeles, CA 90071 Email: van.durrer@skadden.com bertrand.pan@skadden.com</p>	<p>Cloristeen Collins & Patricia Collins c/o KAZAN MCCLAIN LYONS, GREENWOOD, <i>et al.</i> David McClain, Esq. Matthew L. Thiel, Esq. Gloria C. Amell, Esq. 171 Twelfth St., 3rd Floor Oakland, CA 94607 Email: dmccclain@kazanlaw.com gamell@kazanlaw.com</p>
<p>Mt. McKinley Insurance Company c/o WALKER WILCOX MATOUSEK LLP David P. McClain, Esq. Tony L. Draper, Esq. 711 Louisiana St., Suite 3100 So. Tower Pennzoil Place Houston, TX 77002 Email: dmccclain@wwmlawyers.com tdraper@wwmlawyers.com</p>	<p>*Insurance Company of the West Valerie A. Moore, Esq. Eugenie Gifford Baumann, Esq. Sook Y. Won, Esq. c/o HAIGHT, BROWN & BONESTEEL LLP 6080 Center Drive, Suite 800 Los Angeles, CA 90045 Email: vmoore@hbblaw.com ebaumann@hbblaw.com swon@hbblaw.com</p>	<p>Mt. McKinley Insurance Company Charles E. Wheeler, Esq. c/o COZEN O'CONNOR 501 West Broadway; Suite 1610 San Diego, CA 92101 Email: cwheeler@cozen.com</p>

{00028580.DOC; 1}

CERTIFICATE OF SERVICE

<p>OneBeacon Insurance Company as successor in interest to American Employers' Insurance Company SONNENSCHN NATH & ROSENTHAL</p> <p>Paul E. B. Glad, Esq. Joel Muchmore, Esq. Meeghan L. Buckley, Esq. Robert Millner, Esq. 525 Market Street, 26th Floor San Francisco, CA 94105-2708 Email: pglad@sonnenschein.com jmuchmore@sonnenschein.com mbuckley@sonnenschein.com rmillner@sonnenschein.com</p>	<p>Mt. McKinley Insurance Company c/o COZEN O'CONNOR, P.C. Michael J. Smith, Esq. 200 Four Falls Corporate Center, Suite 400, West Conshohocken, PA 19428-0800 Email: msmith@cozen.com</p>	<p>OneBeacon Ins. Company as successor in interest to American Employers' Insurance Company c/o SONNENSCHN NATH & ROSENTHAL LLP Christopher E. Prince, Esq. Sara L. Chenetz, Esq. 601 South Figueroa St., Ste 2500 Los Angeles, California 90017 Email: cprince@sonnenschein.com schenetz@sonnenschein.com</p>
<p>Royal Indemnity Company c/o KELLY, HOCKEL & KLEIN Rebecca B. Aherne, Esq. One Sansome Street, Suite 1800 San Francisco, CA 94104 Email: raherne@khklaw.com</p>	<p>OneBeacon Insurance Company as successor in interest to American Employers' Insurance Company SONNENSCHN NATH & ROSENTHAL Philip A. O'Connell, Jr., Esq. Karen C. Marchiano, Esq. 101 Federal Street, Suite 2750 Boston, MA 02110-1873 Email: poconnelljr@sonnenschein.com kmarchiano@sonnenschein.com</p>	<p>OneBeacon Insurance Company as successor in interest to American Employers' Insurance Company c/o SONNENSCHN NATH & ROSENTHAL LLP Robert B. Millner, Esq. Patrick C. Maxcy, Esq. 233 S. Wacker Drive, Suite 7800 Chicago, IL 60606-6404 Email: rmillner@sonnenschein.com pmaxcy@sonnenschein.com</p>
<p>Safety National Casualty Corporation c/o DUANE MORRIS Philip R. Matthews 1 Market, Spear Street Tower #2000 San Francisco, CA 94105 Email: prmatthews@duanemorris.com</p>	<p>*Safety National Casualty Corporation c/o Andrew K. Epting, Jr., LLC Andrew K. Epting, Jr., Esq. 3 State Street Charleston, SC 29401 Email: ake@epting-law.com</p>	<p>Safety National Casualty Corporation c/o ABBEY, WEITZENBERG, WARREN & EMERY P.C. Mitchell B. Greenberg, Esq. 100 Stony Point Road, Suite 200, P.O. Box 1566 Santa Rosa, CA 95402-1566 Email: mgreenberg@abbeylaw.com</p>
<p>Sompo Japan Insurance Company of America. c/o YOUNGERMAN & MCNUTT Stephen Youngerman, Esq. William J. Glazer, Esq. Nicole A. Temkin, Esq. 11150 W. Olympic Blvd., Ste 900 Los Angeles, CA 90064 Email: sy@ymlaw.net</p>	<p>Sompo Japan Insurance Company of America c/o WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP Joanne Madden, Esq. 525 Market Street, 17th Floor San Francisco, CA 94105-2725 Email: joanne.madden@wilsonelser.com</p>	<p>Sompo Japan Insurance Company of America c/o WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP Mark Ledwin, Esq. 3 Gannett Drive White Plains, NY 10604 Email: mark.ledwin@wilsonelser.com</p>

{00028580.DOC; 1}

CERTIFICATE OF SERVICE

Case No. 09-31347

United States Fidelity and Guaranty Company c/o SIMPSON THACHER & BARTLETT Deborah L. Stein, Esq. Robert J. Pfister, Esq. 1999 Avenue of the Stars, 29th Fl. Los Angeles, CA 90067 Email: dstein@stblaw.com rpfister@stblaw.com	Transport Insurance Company c/o DUANE MORRIS LLP Ray L. Wong, Esq. One Market, Spear Tower Ste 2000 San Francisco, CA 94105-1104 Email: rlwong@duanemorris.com	United National Insurance Company c/o NIXON PEABODY LLP Gregory E. Schopf, Esq. One Embarcadero Center, Suite 1800 San Francisco CA 94111 Email: gschopf@nixonpeabody.com
United States Fire Insurance Company c/o MUSICK, PEELER & GARRETT Stephen M. Green, Esq. Lawrence A. Tabb, Esq. Chad A. Westfall, Esq. One Wilshire Blvd. # 2000 Los Angeles CA 90017 Email: s.green@mpglaw.com l.tabb@mpglaw.com c.westfall@mpglaw.com	United States Fidelity and Guaranty Company c/o SIMPSON THACHER & BARTLETT Jonanthan Sanders, Esq. 2550 Hanover Street Palo Alto, CA 94304 E-mail: jsanders@stblaw.com	United States Fire Insurance Company c/o MUSICK, PEELER & GARRETT Catherine M. Lee, Esq. Chad A. Westfall, Esq. 100 Montgomery St., Suite 2525 San Francisco , CA 94104 Email: c.lee@mpglaw.com c.westfall@mpglaw.com

Unsecured Creditors' Committee Members

Paul McKenzie c/o BERGMAN DRAPER & FROCKT Matthew P. Bergman, Esq. Glenn Draper, Esq. 614 1st Ave., 3rd Floor Seattle, WA 98104 Email: matt@bergmanlegal.com glenn@bergmanlegal.com	*John "Clay" Gregory c/o Law Office of John M. Gregory 1733 Woodside, Suite 200 Redwood City, CA 94061 Email: john.m.gregory@comcast.net	*Monte S. Travis c/o TRAVIS & PON 2271 California Street San Francisco, CA 94115 Email: montetravis@pacbell.net
*Karen Garner Aaron H. Simon, Esq. Ronald J. Shingler, Esq. c/o SIMON & SHINGLER, LLP 3220 Lone Tree Way, Suite 100 Antioch, CA 94509 Email: Aaron@simonshinglerlaw.com Ron@simonshinglerlaw.com	*ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o BERMAN & AIWASIAN Alan S. Berman, Esq. 725 S. Figueroa Street, Suite 1050 Los Angeles, CA 90017 Email: alan.berman@mclolaw.com	Linda Seiler c/o KAZAN, MCCLAIN, LYONS, GREENWOOD & HARLEY David McClain, Esq. Matthew L. Thiel, Esq. 171 12th St., Suite 300 Oakland, CA 94607 Email: dmccclain@kazanlaw.com mthiel@kazanlaw.co
c/o BRAYTON PURCELL LLP Alan R. Brayton, Esq. Christina C. Skubic, Esq. Matthew B. Lee, Esq. 222 Rush Landing Road P.O. Box 6169 Novato, CA 94945 Email: abrayton@braytonlaw.com cskubic@braytonlaw.com mlee@braytonlaw.com		

{00028580.DOC; 1}

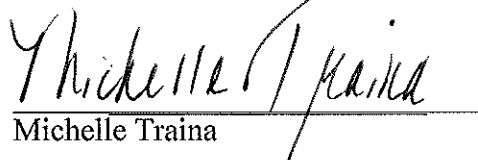
CERTIFICATE OF SERVICE

Case No. 09-31347

EMAIL SERVICE LIST

Aaron@simonshinglerlaw.com, aaronjohnson@omm.com, abrayton@braytonlaw.com, afrankel@stblaw.com, agiacobbe@zeklaw.com, ake@epling-law.com, alan.berman@mcclolaw.com, bertrand.pan@skadden.com, bphelps@lynberg.com, c.lee@mpglaw.com, c.westfall@mpglaw.com, cjbrown@omm.com, ckendrick@crowell.com, cprince@sonnenschein.com, cskubic@braytonlaw.com, cwheeler@cozen.com, david.j.gordon@verizon.net, mgulland@grippolden.com, dhanley@paulandhanley.com, dmcclain@kazanlaw.com, Donna.S.Tamanaha@usdoj.gov, dstein@stblaw.com, dvogelsang@grippolden.com, ebaumann@hbblaw.com, gamell@kazanlaw.com, gfergus@ferguslegal.com, glenn@bergmanlegal.com, gschoopf@nixonpeabody.com, james.schaefer@skadden.com, jcarlisle@lynberg.com, jcrom@bachcrom.com, jeffrey.mckenna@skadden.com, jkaufman@bhplaw.com, jmiller@smollp.com, jmuchmore@sonnenschein.com, joanne.madden@wilsonelser.com, john.m.gregory@comcast.net, jpaul@paulandhanley.com, jraskin@morganlewis.com, jsanders@stblaw.com, kcusick@crowell.com, kmarchiano@sonnenschein.com, kmclendon@stblaw.com, kcmeeke@paulandhanley.com, l.tabb@mpglaw.com, ldavis@crowell.com, lmartin@stblaw.com, lmurray@grippolden.com, mahrens@sheppardmullin.com, mark.ledwin@wilsonelser.com, matt@bergmanlegal.com, mbuckley@sonnenschein.com, mcorrea@jonesday.com, mdavis@zeklaw.com, mgreenberg@abbeylaw.com, Minnie.Loo@usdoj.gov, mlee@braytonlaw.com, montetravis@pacbell.net, mplevin@crowell.com, msitzer@grippolden.com, msmith@cozen.com, mthiel@kazanlaw.com, nbloomberg@crowell.com, pglad@sonnenschein.com, phein@omm.com, pjbenvenuti@jonesday.com, pmaxcy@sonnenschein.com, poconnelljr@sonnenschein.com, psheldon@grippolden.com, pvnl@capdale.com, raherne@khklaw.com, raoul.kennedy@skadden.com, rdo@lynberg.com, rgoetz@omm.com, rlwong@duanemorris.com, rmillner@sonnenschein.com, Ron@simonshinglerlaw.com, rpeters@lynberg.com, rpfister@stblaw.com, s.green@mpglaw.com, sbergman@omm.com, schenetz@sonnenschein.com, spencerjones@omm.com, srice@crowell.com, swon@hbblaw.com, sy@ymlaw.net, tbui@crowell.com, tdraper@wwmlawyers.com, tkeller@jonesday.com, tschiavoni@omm.com, tyoon@crowell.com, van.durrer@skadden.com, vmoore@hbblaw.com, prmatthews@duanemorris.com, qmewers@crowell.com; pmeringolo@smollp.com; jshoda@smollp.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, that this declaration is executed on **November 24, 2009**, at San Francisco, California.


Michelle Traina